

**IN THE STATE COURT OF HOUSTON COUNTY
STATE OF GEORGIA**

DEMARIUS DEAN,

Plaintiff,

VS.

**STEPHEN SCHNOES, EQUINE
EXPRESS N. A., INC., and OLD
REPUBLIC INSURANCE CO.,**

Defendants.

CIVIL ACTION NO. _____

Original Complaint for Damages

Teresa Hathaway
Teresa Hathaway, Clerk of State Court
Houston County, Georgia

ORIGINAL COMPLAINT FOR DAMAGES

Plaintiff, DEMARIUS DEAN, respectfully shows:

1.

Defendant, Stephen Schnoes, is a resident of Sedalia County, Colorado, but he is subject to the jurisdiction and venue of this Court under the Georgia Non-Resident Motorist Act.

2.

Defendant, Equine Express N. A., Inc. (hereinafter "Equine"), is a Texas corporation entity that is being named as a joint tort feisor and it is subject to the jurisdiction and venue of this court.

3.

Defendant, Old Republic Insurance Co. (hereinafter "Old Republic"), is a foreign insurance company that provided public liability insurance on the contract carrier that was involved in this wreck and is subject to the jurisdiction and venue of this Court.

4.

On October 26, 2019, the Plaintiff was seriously injured in a wreck that occurred on I-75 in Monroe County, Georgia, that was caused by the negligence of Defendant Schnoes.

EXHIBIT "A"

5.

As a result of this Defendant's negligence, the Plaintiff was seriously injured and has incurred medical expense and other actual damages in excess of \$40,070.17.

6.

Defendant Schnoes is directly liable to Plaintiff for the damages arising from this wreck.

7.

Defendant Schones was acting in the scope of his employment with Defendant Equine and they are vicariously liable for Plaintiff's damages under the doctrine of respondeat superior or other applicable laws.

8.

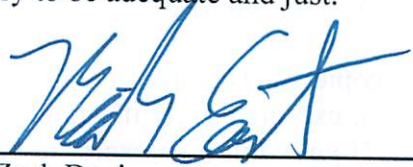
Defendant Old Republic is liable in this action under its insurance contract and the law of Georgia for the negligence of its insureds.

9.

Plaintiff is entitled to recover damages from the Defendants for his past and future actual damages and her past and future pain and suffering.

WHEREFORE, Plaintiff prays that he have a trial by jury and that he have judgment against the Defendants in an amount found by that jury to be adequate and just.

The Dozier Law Firm, LLC
327 Third Street
Macon, GA 31201
(478) 742 - 8441



Zack Dozier
GA Bar No. 228800
Micah East
GA Bar No. 118743
Attorneys for Plaintiff

**STATE COURT OF HOUSTON COUNTY
STATE OF GEORGIA**

CIVIL ACTION NUMBER 2021-V-53589

Dean, Demarius

PLAINTIFF

VS.

Schnoes, Stephen
Equine Express N. A., Inc.
Old Republic Insurance Co.

DEFENDANTS

SUMMONS

TO: SCHNOES, STEPHEN

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney, whose name and address is:

**Zack Dozier
Dozier Law Firm, LLC
327 Third Street
Macon, Georgia 31201**

an answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

This 6th day of October, 2021.

Clerk of State Court



Teresa Hathaway, Clerk of State Court
Houston County, Georgia

**STATE COURT OF HOUSTON COUNTY
STATE OF GEORGIA**

CIVIL ACTION NUMBER 2021-V-53589

Dean, Demarius

PLAINTIFF

VS.

Schnoes, Stephen
Equine Express N. A., Inc.
Old Republic Insurance Co.

DEFENDANTS

SUMMONS

TO: EQUINE EXPRESS N. A., INC.

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney, whose name and address is:

**Zack Dozier
Dozier Law Firm, LLC
327 Third Street
Macon, Georgia 31201**

an answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

This 6th day of October, 2021.

Clerk of State Court



Teresa Hathaway, Clerk of State Court
Houston County, Georgia

**STATE COURT OF HOUSTON COUNTY
STATE OF GEORGIA**

CIVIL ACTION NUMBER 2021-V-53589

Dean, Demarius

PLAINTIFF

VS.

Schnoes, Stephen
Equine Express N. A., Inc.
Old Republic Insurance Co.

DEFENDANTS

SUMMONS

TO: OLD REPUBLIC INSURANCE CO.

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney, whose name and address is:

**Zack Dozier
Dozier Law Firm, LLC
327 Third Street
Macon, Georgia 31201**

an answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

This 6th day of October, 2021.

Clerk of State Court



Teresa Hathaway, Clerk of State Court
Houston County, Georgia

General Civil and Domestic Relations Case Filing Information Form

FILED IN OFFICE
CLERK OF STATE COURT
HOUSTON COUNTY, GEORGIA
2021-V-53589
JASON E. ASHFORD
OCT 06, 2021 10:59 AM

☐ Superior or ☒ State Court of Houston County

For Clerk Use Only

Date Filed 10-06-2021

MM-DD-YYYY

Case Number 2021-v-53589

Teresa Hathaway
Teresa Hathaway, Clerk of State Court
Houston County, Georgia

Plaintiff(s)

Dean, Demarius

Last First Middle I. Suffix Prefix

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Last First Middle I. Suffix Prefix

Last First Middle I. Suffix Prefix

Plaintiff's Attorney Dozier, Zack

Defendant(s)

Schnoes, Stephen

Last First Middle I. Suffix Prefix

Equine Express N. A., Inc.

Last First Middle I. Suffix Prefix

Old Republic Insurance Co.

Last First Middle I. Suffix Prefix

Last First Middle I. Suffix Prefix

Bar Number 228800

Self-Represented ☐

Check one case type and, if applicable, one sub-type in one box.

General Civil Cases

- ☒ Automobile Tort
☐ Civil Appeal
☐ Contract
☐ Contempt/Modification/Other Post-Judgment
☐ Garnishment
☐ General Tort
☐ Habeas Corpus
☐ Injunction/Mandamus/Other Writ
☐ Landlord/Tenant
☐ Medical Malpractice Tort
☐ Product Liability Tort
☐ Real Property
☐ Restraining Petition
☐ Other General Civil

Domestic Relations Cases

- ☐ Adoption
☐ Contempt
☐ Non-payment of child support, medical support, or alimony
☐ Dissolution/Divorce/Separate Maintenance/Alimony
☐ Family Violence Petition
☐ Modification
☐ Custody/Parenting Time/Visitation
☐ Paternity/Legitimation
☐ Support – IV-D
☐ Support – Private (non-IV-D)
☐ Other Domestic Relations

- ☐ Check if the action is related to another action(s) pending or previously pending in this court involving some or all of the same parties, subject matter, or factual issues. If so, provide a case number for each.

Case Number

Case Number

- ☒ I hereby certify that the documents in this filing, including attachments and exhibits, satisfy the requirements for redaction of personal or confidential information in O.C.G.A. § 9-11-7.1.

- ☐ Is a foreign language or sign-language interpreter needed in this case? If so, provide the language(s) required.

Language(s) Required

- ☐ Do you or your client need any disability accommodations? If so, please describe the accommodation request.

Civil Action No. 2021-V-53589

Date Filed 10/6/21

Attorney's Address
Micah East
327 Third St
Macon, GA

Superior Court ☐ **FILED IN OFFICE**
State Court ☒ **PROBATE COURT**
Juvenile Court ☐
Georgia, Houston
Demetrius Deary
Teresa Hathaway
Teresa Hathaway, Clerk of State Court
Houston County, Georgia
Plaintiff

Name and Address of Party to be Served.
Old Republic Insurance Company
c/o Peatrice-Hall Corporation System
2 Sun Court, STE 400
Peachtree Corners, GA 30092

VS.
Stephen Schuett, Equine Express
N.A., Inc., and Old Republic Insurance
Defendant

SHERIFF'S ENTRY OF SERVICE

Garnishee

PERSONAL

☐ I have this day served the defendant _____ personally with a copy of the within action and summons.

NOTORIOUS

☐ I have this day served the defendant _____ by leaving a copy of the action and summons at his most notorious place of abode in this County.
☐ Delivered same into hands of _____ described as follows:
age, about _____ years; weight _____ pounds; height, about _____ feet and _____ inches, domiciled at the residence of defendant.

CORPORATION

☒ Served the defendant Old Republic Insurance Company a corporation by leaving a copy of the within action and summons with Alisha Smith in charge of the office and place of doing business of said Corporation in this County.

TACK & MAIL

☐ I have this day served the above styled affidavit and summons on the defendant(s) by posting a copy of the same to the door of the premises designated in said affidavit, and on the same day of such posting by depositing a true copy of same in the United States Mail, First Class in an envelope properly addressed to the defendant(s) at the address shown in said summons, with adequate postage affixed thereon containing notice to the defendant(s) to answer said summons at the place stated in the summons.

NON EST

☐ Diligent search made and defendant _____ not to be found in the jurisdiction of this Court.

This 14 day of October, 2021.

J. Williams Souza
DEPUTY

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Stephen Schuoes
 107 N. Kings Canyon Dr.
 Cedar Park, TX 78613

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X. *Donna Mason*

☐ Agent☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1?

☐ Yes

If YES, enter delivery address below:

☒ No

Teresa Hathaway, Clerk of State Court
 Houston County, Georgia

Teresa Hathaway



9590 9402 5208 9122 7743 97

7021 0350 0000 5485 9116

NOV 10, 2021 05:39 PM

JASON E. ASHTFORD
 2021-11-09 17:02
 8899-1702

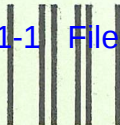
FILED IN OFFICE
 CLERK OF STATE COURT
 HOUSTON COUNTY, GEORGIA

3. Service Type

☐ Adult Signature☐ Adult Signature Restricted Delivery☐ Certified Mail®☐ Certified Mail Restricted Delivery☐ Insured Mail☐ Insured Mail Restricted Delivery☐ Signature Confirmation☐ Signature Confirmation Restricted Delivery (over \$500)☐ Priority Mail Express®☐ Registered Mail™☐ Registered Mail Restricted Delivery☒ Return Receipt for Merchandise☐ Signature Confirmation™☐ Signature Confirmation Restricted Delivery



USPS TRACKING#
AUSTIN TX 787



First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

9590 9402 5208 9122 7743 97

**United States
Postal Service**

• Sender: Please print your name, address, and ZIP+4® in this box•

**Dozier Law Firm
Micah East
327 Third Street
P.O. Box 13
Macon, GA 31202**

D. Dozier

2-001313

